

Modern Slavery & Human Trafficking Statement

Introduction

Climalife is opposed to all forms of unethical business behaviour. We recognise the harmful impact that modern slavery has on individuals and society, and we are committed to help prevent these illegal practices.

Our business and supply chain

Climalife distributes a comprehensive range of refrigerants, oils, and other chemical products, across a wide range of industries and supply chains. In the UK we employ 23 people, based primarily from our office in Bradley Stoke, Bristol.

Our reputation and continued growth is down to our employees and we continue to put in place policies and training to ensure that we, and our supply chain, adhere to best practice in all areas of employment.

Policies and control on Modern Slavery

Climalife is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking, within our own business, our supply chains and through any business relationships. We aim to alert our staff to the potential risks in our business, and in the wider supply chain, and encourage them to report concerns to management, where they are expected to be acted upon.

We will achieve this aim by identifying and mitigating risks in the following ways (but not limited to):

- We assess modern slavery and human trafficking risks in our business.
- We comply with all relevant employment and human rights laws in the UK.
- We will provide training to employees including on the 'red flags' of modern slavery and human trafficking.
- We encourage the reporting of concerns and the protection of whistle blowers.
- We will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking and expect those in our supply chain to comply with our values.

We uphold high standards for our own colleagues, operate in line with our recruitment policies and comply fully with the relevant employment laws and right to work checks. We have clear standards of conduct which are included in our Code of Conduct ("Code"). The Code includes a specific section on modern slavery, including the red flags for colleagues to be aware of.

We abhor recruitment based on harbouring or transporting people into situations of exploitation through violence, deception or coercion. We condemn employment practices in which people are subjected to servitude or forced to work against their will.

We embrace principles supportive of equal treatment without discrimination and with the protection of employment law for all staff. They are broadly based on those developed by the United Nations, International Labour Organisation, Institute for Human Rights and Business and the Ethical Trading Initiative.

Climalife's people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

We treat all staff equally, without discrimination and with respect for their human rights. All staff enjoy the protection of relevant UK law in respect of their employment. In particular: -

- We bear the full costs of recruitment and do not charge staff fees for hiring, placing or promoting them.
- We provide written statements of terms and conditions of employment to all staff as required by law. These documents explain everything in a clear and transparent way.
- We support the right to seek, obtain and hold employment without discrimination and with complete respect for dignity.
- We do not coerce anyone to work for us. When you choose to work for us you do so voluntarily.
- Everyone is paid regularly, in accordance with their terms and conditions of employment. Pay rates always meet or exceed the UK national living wage. We provide a written summary of pay and deductions (pay slip) for each pay period.
- Working hours and rest breaks always meet UK law. We summarise the detail in your written statement of terms and conditions of employment.
- Everyone has the right to join or not join a trade union at their complete discretion.
- We provide safe and decent working conditions with suitable training as necessary. Our operations comply with or exceed statutory health and safety standards.
- We provide formal grievance provisions through which staff are free to lodge a work-related complaint or raise a matter of concern.
- We do not impede anyone's freedom of movement or their opportunity to seek employment elsewhere.
- We do not utilise child labour. UK law governs the work of any young person that we employ.

Due diligence within our own business

All new employees or workers must bring their identification documents on their first day so that our business can check them. This ensures that the worker we are expecting has arrived at site but also, crucially, that the worker has access to their own documents – confiscation of victims' identification documents in order to exert control over them is a common tactic used by gangs involved in modern slavery.

Due diligence within our supply chain

We are committed to building long-term relationships with suppliers and value open and honest communication. In the event of non-compliance, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. We reserve the right to terminate any agreements in line with any contractual obligations should a supplier decide that compliance with this statement is impossible, or where a supplier shows repeated disregard for the provisions of this statement.

Issue response

We have an issue response plan which details how the business will deal with any incidences of modern slavery identified within our own business or our supply chains. This details how we will support victims as well as how we will manage investigations and in the case of suppliers, how we will suspend trading with them while supporting them to mitigate the identified issues and risks.

Training

In 2025, all employees will be required to complete a bite-sized modern slavery training module through our e-learning platform, as well as face-to-face training detailing the modern slavery red flags employees should remain alert to, and how to report concerns. A Code of Conduct has been issued to all UK employees which includes a section on modern slavery.

Performance

Our leading KPI for anti-slavery performance is training completion. We also track whether there have been any reported incidents of modern slavery during the year.

Training will be completed in 2025 for all employees.

No incidents of modern slavery were identified in our own business during 2024.

Progress in 2024

We have revised our Modern Slavery and Human Trafficking Policy and have issued a Code of Conduct to all our employees.

Focus for 2025

Two mandatory trainings for all employees will be rolled out in 2025. One is a short e-learning course, and the other is face-to-face training which will detail the modern slavery red flags employees should remain alert to, and how to report concerns.

We will continue to develop our approach, review our progress and publish an updated statement annually.

This statement was approved by the Managing Director of Climalife on 06/12/2024

Allan Harper, Managing Director

Climalife

06/12/2024